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11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**
13 **SOUTHERN DIVISION**

14
15 PHILIP ALVAREZ, RANDALL
16 BETTISON, MARC KELLEHER, and
17 DARLENE VAUGH individually and
on behalf of all others similarly situated,

18 Plaintiffs,

19 v.

20 SIRIUS XM RADIO INC.,

21 Defendant.

22 Case No. 2:18-cv-8605-JVS-SS

23
24 **DECLARATION OF PAUL
WRIGHT IN SUPPORT OF
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

1 I, Paul Wright, declare as follows:

2 1. I submit this declaration in support of preliminary approval of the Class
3 Action Settlement in the matter of *Alvarez v. Sirius XM Radio Inc.*, Case No. 2:18-cv-
4 8605-JVS-SS (C.D. Cal.). The matters stated herein are true of my own knowledge or,
5 where indicated, I am informed and believe that they are true. If called upon as a
6 witness, I could and would competently testify as follows.

7 2. I am a competent adult over the age of eighteen years of age and a resident
8 of California.

9 3. I have participated in this litigation throughout its pendency, including by
10 discussing my experience with purchasing a lifetime subscription from Sirius XM,
11 searching for and gathering any relevant documents, reviewing the complaints, being
12 available for my attorneys throughout the litigation, staying updated about the
13 litigation, and approving the terms of the proposed Settlement.

14 4. I have reviewed, understood, and fully agree to the terms and conditions
15 of the proposed Settlement. I approve and support the Settlement because I believe
16 that it is fair, reasonable, and in the best interests of the Class. I have no conflict with
17 the Class and pursued this litigation so that I would help others who similarly
18 purchased a lifetime subscription from Sirius XM.

19 5. The lifetime subscription I purchased from Sirius XM is associated with
20 a Device that was activated to receive Sirius XM's satellite radio service prior to June
21 5, 2020 and that continues to receive the Sirius XM satellite radio service.

22 6. My lifetime subscription is therefore an Active Lifetime Subscription.

23 7. I retained attorneys experienced in consumer class action litigation, and
24 understood they would represent the best interests of the Class.

25 8. I request that this Court approve the Settlement Agreement because it is
26 in the best interests of the Class.

1 9. I also request that I be awarded \$5,000 for my work on this case in
2 securing relief for hundreds of thousands of consumers.

4 I declare under penalty of perjury under the laws of the United States that the
5 foregoing is true and correct. Executed this 5th day of June 2020 in Huntington Beach,
6 California.

Paul Wright (Jun 6, 2020 14:09 PDT)

Paul Wright